

17. Second blue box: Shows that for the UWBZ, the maximum permissible benzene concentration for transition to Monitored Natural Attenuation (MNA) is 1400 ug/L in groundwater. The May 2014 Final RD/RAWP states on page 4-9 that the target benzene concentrations in the thermal treatment zone is 100 to 500 ug/L, as "This concentration range is predicted to achieve cleanup levels within the 20-year remedial timeframe based on modeling of groundwater contaminant attenuation outside the TTZs after active EBR". Thus, these two criteria appear contradictory. Discussions between the Air Force team and the agencies' teams have highlighted the fact that there is considerable uncertainty in AF's modeling performed to date. Additional modeling using an agreed-upon modeling approach should be used to determine whether or not the SEE TTZ requires additional treatment, based on post-SEE soil and groundwater concentrations.

18. The second yellow box states that the Desired Trend for Sulfate migration is that it not migrate outside of the EBR area. Figure E-4 predicts that sulfate will be migrating out of the EBR area in the CZ within 150 days of injection at wells CZ12, CZ14, and CZ16, and Figure E-7 of Addendum #2 predicts that this will continue for more than 1990 days. Figure E-15 predicts that sulfate injected at W34 will migrate out of the EBR area. This would indicate the need for recirculation/containment throughout EBR. The Agencies are particularly concerned that remedial activities for ST12 must not degrade water quality down gradient of the site that could impact private or City of Mesa supply wells in the future.

19. The second yellow box states that the Desired Trend for Arsenic Concentrations is "Arsenic concentrations exceed MCLs". The desired trend should be for the arsenic concentrations to not exceed MCLs. Arsenic should not be injected with the sulfate solution at concentrations that exceed the MCLs.

Please contact us if you have any questions about this letter.

Sincerely,



Carolyn d'Almeida  
Remedial Project Manager, EPA

Wayne Miller  
Remedial Project Manager, ADEQ

cc: Ardis Dickey, AFCEC